

DeMaria, Eva

From: MCCLINCY Matt <MCCLINCY.Matt@deq.state.or.us>
Sent: Thursday, July 30, 2015 3:41 PM
To: LIVERMAN Alex; DeMaria, Eva
Cc: Sheldrake, Sean
Subject: RE: Info on US Moorings and Navy Reserve Swan Island

Eva,

I would not necessary call the Navy Reserve recalcitrant. My understanding is that they were creatively using some funds to close out riverbank issues associated with a release from a UST. When DEQ expanded the project to include a site preliminary assessment and stormwater evaluation, they balked given their funding limitations. This led to the EPA referral.

Matt

From: LIVERMAN Alex
Sent: Thursday, July 30, 2015 2:53 PM
To: 'DeMaria, Eva'
Cc: MCCLINCY Matt; Sheldrake, Sean
Subject: RE: Info on US Moorings and Navy Reserve Swan Island

Hi Eva.

The US Moorings site operates under the 1200Z permit. The City of Portland is DEQ's agent for the 1200Z registrants in Portland and inspects this facility. The latest inspection info, enforcement referrals and DEQ and USACE response documents are attached. I also included the email on contacts for the dock work coordination for the 404-like process that Sean mentioned. I believe the last contact, Jody Marshall, has left the USACE, though. Back to Chris Budai...

The Navy Reserve site was referred to EPA for source control work in 2011 after being non-responsive to DEQ's efforts. There is very little information available on that site.

The Coast Guard site (next door to the Navy) has been cooperative on source control efforts with DEQ. Dan Hafley is the current project manager and we did a joint site visit with the City of Portland inspector a few years back. Even though USCG doesn't have a permit, it is a site with industrial activities that the City inspects every so often and gives technical advice to under their authority of the MS4 permit and City Code. USCG is currently implementing additional source control measures and subsequent effectiveness monitoring and we expect to write a SCD in 2016.

Thanks again for the offer of 1200Z enforcement help, but we have that covered through the appropriate channels (City referrals and DEQ Office of Compliance and Enforcement) per our Performance Partnership Agreement with EPA Region Office of Water. I will certainly keep you posted on sites that can use a nudge from EPA to support DEQ's requests for source control work (stormwater, groundwater or soils/banks), though, whether they have an NPDES nexus or not.

Talk to you again soon...

--Alex

From: DeMaria, Eva [<mailto:DeMaria.Eva@epa.gov>]
Sent: Thursday, July 30, 2015 2:26 PM
To: LIVERMAN Alex
Cc: MCCLINCY Matt; Sheldrake, Sean
Subject: Info on US Moorings and Navy Reserve Swan Island

Hi Alex-

During our meeting yesterday, you mentioned that DEQ/the City? had attempted to obtain SW information from US Moorings and the US Navy Reserve on Swan Island as part of your source control evaluations. Both have proven recalcitrant. If you could send me what inspection reports, storm water info you have on both sites, that would be most appreciated. Coast Guard too?

Also, as I've mentioned previously, and I know I'm sounding like a broken record, if you have facilities that are either taking either too long in complying with the 1200Z permit or the CWA, and you believe they need a little push (or inspection) from EPA, please pass those names on to me. The NPDES Compliance Unit here usually plans inspections a year ahead of schedule and the targeting for inspections in 2016 is happening now.

Thanks again.

Eva DeMaria

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